

U.S. Department of Justice

Washington, DC 20530

Exhibit A to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <http://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <http://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <http://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name and Address of Registrant STRATEGY XXI GROUP, LLC		2. Registration No. 6058						
3. Name of Foreign Principal AZERBAIJAN AMERICA ALLIANCE CORPORATION BOARD OF DIRECTORS	4. Principal Address of Foreign Principal 1101 PENNSYLVANIA AVENUE, N.W., SUITE 700 WASHINGTON, DC 20004							
5. Indicate whether your foreign principal is one of the following:								
<input type="checkbox"/> Foreign government <input type="checkbox"/> Foreign political party <input checked="" type="checkbox"/> Foreign or domestic organization: If either, check one of the following: <table border="0"> <tr> <td><input type="checkbox"/> Partnership</td> <td><input type="checkbox"/> Committee</td> </tr> <tr> <td><input type="checkbox"/> Corporation</td> <td><input type="checkbox"/> Voluntary group</td> </tr> <tr> <td><input type="checkbox"/> Association</td> <td><input checked="" type="checkbox"/> Other (<i>specify</i>) BOARD OF DIRECTORS OF A DELEWARE COMPANY</td> </tr> </table>			<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee	<input type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group	<input type="checkbox"/> Association	<input checked="" type="checkbox"/> Other (<i>specify</i>) BOARD OF DIRECTORS OF A DELEWARE COMPANY
<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee							
<input type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group							
<input type="checkbox"/> Association	<input checked="" type="checkbox"/> Other (<i>specify</i>) BOARD OF DIRECTORS OF A DELEWARE COMPANY							
<input type="checkbox"/> Individual-State nationality								
6. If the foreign principal is a foreign government, state:								
a) Branch or agency represented by the registrant N/A								
b) Name and title of official with whom registrant deals								
7. If the foreign principal is a foreign political party, state:								
a) Principal address N/A								
b) Name and title of official with whom registrant deals								
c) Principal aim								

Formerly CRM-157

FORM NSD-3
Revised 03/11

8. If the foreign principal is not a foreign government or a foreign political party:

a) State the nature of the business or activity of this foreign principal.

The Board of Directors is comprised of foreign nationals who direct a Delaware corporation that is established to encourage research and advocacy about the Azeri people and provide information broadly about such people, including issues related to their country, culture and international relations.

b) Is this foreign principal:

Supervised by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Owned by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Directed by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Controlled by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Financed by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Subsidized in part by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page must be used.)

N/A

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

The Board of Directors is comprised of foreign nationals who direct a Delaware corporation that is established to encourage research and advocacy about the Azeri people and provide information broadly about such people, including issues related to their country, culture and international relations.

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit A to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date of Exhibit A	Name and Title	Signature
August 03, 2012	Andrew D Frank, Managing Partner	/s/ Andrew D Frank
		eSigned

U.S. Department of Justice

Washington, DC 20530

Exhibit B to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <http://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <http://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <http://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant

STRATEGY XXI GROUP, LLC

2. Registration No.

6058

3. Name of Foreign Principal

AZERBAIJAN AMERICA ALLIANCE CORPORATION BOARD OF DIRECTORS

Check Appropriate Box:

4. ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. ☒ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

The Registrant, Strategy XXI Group, will work with Fabiani & Company and the Board of Directors of the Azerbaijan America Alliance Corporation Board, a Delaware corporation, to encourage research and advocacy about the Azeri people and provide information broadly about such people, including issues related to their country, culture and international relations.

8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Planning and executing effective strategies to encourage research and advocacy about the Azeri people and provide information broadly about such people, including issues related to their country, culture and international relations.

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Outreach and other requested outreach efforts to present important issues of the Azerbaijan people to the American public; outreach to staff members of the House Foreign Affairs, US Congress as well as NSA in order to secure meetings for Fabiani & Company or its client, Azerbaijan America Alliance Corporation Board of Directors.

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit B to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date of Exhibit B	Name and Title	Signature
August 03, 2012	Andrew D Frank, Managing Partner	/s/ Andrew D Frank eSigned

Footnote: Political activity as defined in Section 1(o) of the Act means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.



December 1, 2011

Mr. James Fabiani
Fabiani & Co.
1101 Pennsylvania Avenue, 7th Floor
Washington, D.C. 20004

Dear Mr. Fabiani:

This letter outlines the terms of the on-going relationship of Fabiani (the "Client") and Strategy XXI (the "Agency") as it relates to the Azerbaijan America Alliance.

The Client has retained the Agency, as of June 1, 2011 to assist with work related to the Azerbaijan-America Alliance. The Agency is retained to work on media outreach and other requested outreach efforts for the Alliance in its efforts to present important issues of the Azerbaijan people to the American public. The Agreement is effective as of June 1 and will continue in full force through February 29, 2012, when both parties can agree to continue the engagement. Either party can terminate the Agreement upon not less than sixty (60) days written notice.

The Client has agreed to compensate the Agency for its services in the following manner: June: \$20,000; July: \$25,000; August: \$15,000; September through February, 2012: \$25,000, per month.

The Agency will submit itemized expense invoices to the Client on a monthly basis and those invoices are payable to the Client within 5 business days of the Client's receipt of funds from the Azerbaijan America Alliance. Out-of-pocket expenses, which are incurred on the Client's behalf, such as prorated telephone calls, faxes, subscriptions, photocopying charges, postage and express charges are subject to a 6% commission charge. Travel, defined as business airfare when international, economy when domestic, and hotel and meals while on travel, will be billed at cost. All bills are payable upon receipt. The Agency will not retain third parties or enter into third party contracts without the express written/e-mailed permission of the Client.

The Agency agrees that information and materials provided by the Client to the Agency on a confidential basis shall be held in confidence by the Agency except as otherwise required by law.

The Agreement shall be governed and construed in accordance with the laws of the District of Columbia.

Strategy XXI Partners
515 Madison Avenue, 13th Floor, New York, NY 10022, USA
Tel: +1.212-935-0210 – e-mail: infor@strategy-xxi.com, www.strategy-xxi.com



The parties each individually represent and warrant that each has full power and authority to enter into this Agreement and to perform their obligation hereunder without violating the legal or equitable rights of any third party.

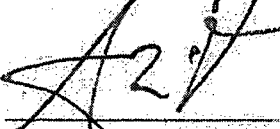
If these terms are agreeable to you, please countersign below and retain one copy for your files, returning the original to us.

Agreed to by the Client:


James Fabiani

12-15-11
Date

Agreed to by the Agency:


Andrew Frank

12/15/11
Date


Harriet Mouchly-Weiss

12/15/11
Date

Strategy XXI Partners
515 Madison Avenue, 13th Floor, New York, NY 10022, USA
Tel: +1.212-935-0210 - e-mail: infor@strategy-xxi.com, www.strategy-xxi.com